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May 24, 2023

**Via CM/ECF**

The Honorable Gabriel W. Gorenstein  
U.S. District Court for the Southern District of New York  
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New York, NY 10007

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Re: *Donna Wood, et al. v. Mike Bloomberg 2020, Inc.*, No. 20 Civ. 2489 (LTS) (GWG)

Dear Judge Gorenstein:

We represent Defendant Mike Bloomberg 2020, Inc. (the “Campaign”) in the above referenced matter. We write, pursuant to the Court’s Order dated May 23, 2023 (Dkt. 352), to advise that the Campaign elects to have its letter docketed as Dkt. 350, serve as its moving papers in connection with the Campaign’s motion to compel Plaintiff Tristan Angulo to answer questions that his counsel instructed him not to answer at his deposition.

Pursuant to Rule 2.B of this Court’s Individual Practices, the parties have agreed on the following briefing schedule:

- Plaintiffs’ opposition shall be filed on Friday, June 2, 2023.
- The Campaign’s reply shall be filed on Thursday, June 8, 2023.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ *Mark W. Batten*

Mark W. Batten

cc: All Counsel of Record (via CM/ECF)